

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF ILLINOIS

UNITED STATES OF AMERICA,

Plaintiff,

vs.

SHU K. CHEN,

a/k/a Zhang Chang

a/k/a Chang Zhang

Defendant.

CASE NUMBER:

3:15-mj-3002-DGW

FILED UNDER SEAL

FILED

JAN 08 2015

CLERK, U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF ILLINOIS  
EAST ST LOUIS OFFICE

CRIMINAL COMPLAINT

I, Christopher W. Williams, Special Agent of the United States Secret Service, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief:

COUNT 1

Conspiracy to Commit Wire Fraud

1. In or about December, 2014, in Madison County, Illinois, within the Southern District of Illinois, and elsewhere,

**SHU K. CHEN a/k/a Zhang Chang a/k/a Chang Zhang,**

defendant herein, did conspire with others to cause the foreseeable use of interstate wire communications in furtherance of a scheme to defraud and to obtain money and property by means of fraudulent representations.

2. As part of the conspiracy **SHU K. CHEN a/k/a Zhang Chang a/k/a Chang Zhang** used credit cards which were counterfeit in that the credit cards had different account

numbers imprinted on the front than the account numbers fraudulently encoded with legitimate account numbers on the magnetic strip on the back of the cards. The account numbers on the back of the credit cards were means of identification of other persons and were used without authorization.

3. Another individual assisted **SHU K. CHEN a/k/a Zhang Chang a/k/a Chang Zhang** by providing the counterfeit credit cards and driving around the Missouri and Illinois area to merchant businesses to have **SHU K. CHEN a/k/a Zhang Chang a/k/a Chang Zhang** use the counterfeit access devices.

4. **SHU K. CHEN a/k/a Zhang Chang a/k/a Chang Zhang** purchased gift cards and various merchandise at retail stores with the counterfeit and unauthorized access devices, which were financial transactions by wire communications in interstate commerce.

All in violation of Title 18, United States Code, Section 1349.

## **COUNT 2**

### **USE OF COUNTERFEIT ACCESS DEVICES: DECEMBER 11, 2014**

On or about December 11, 2014, in Madison County, within the Southern District of Illinois,

**SHU K. CHEN a/k/a Zhang Chang a/k/a Chang Zhang**,  
defendant herein, knowingly and with the intent to defraud, did use counterfeit access devices. The use affected interstate commerce through the use of the counterfeit access devices by the Defendant to fraudulently purchase gift cards at the Collinsville Walmart. The access devices were credit cards which were counterfeit and fictitious in that the magnetic strip on the back of the cards contained account numbers which did not match the account numbers on the front of the credit cards and the account numbers fraudulently encoded on the magnetic strips were used

without the authority of the actual owners of the account numbers.

All in violation of Title 18, United States Code, Section 1029(a)(1).

**COUNT 3**

**AGGRAVATED IDENTITY THEFT: DECEMBER 11, 2014**

On or about December 11, 2014, in Madison County, Illinois, within the Southern District of Illinois,

**SHU K. CHEN a/k/a Zhang Chang a/k/a Chang Zhang,**  
defendant herein, did knowingly use without lawful authority a means of identification of another person, knowing that the means of identification belonged to another person, during and in relation to the felony offense of Use of a Counterfeit Access Device as charged in Count 2 through the use of an access device account number of a specific individual, victim "M.B.", used without authority in interstate commerce to purchase gift cards.

All in violation of Title 18, United States Code, Section 1028A.

**COUNT 4**

**USE OF COUNTERFEIT ACCESS DEVICES: DECEMBER 12, 2014**

On or about December 12, 2014, in Madison County, within the Southern District of Illinois,

**SHU K. CHEN a/k/a Zhang Chang a/k/a Chang Zhang,**  
defendant herein, knowingly and with the intent to defraud, did use counterfeit access devices. The use affected interstate commerce through the use of the counterfeit access devices by the Defendant to fraudulently purchase gift cards at the Collinsville Walmart. The access devices were credit cards which were counterfeit and fictitious in that the magnetic strip on the back of the cards contained account numbers which did not match the account numbers on the front of

the credit cards and the account numbers fraudulently encoded on the magnetic strips were used without the authority of the actual owners of the account numbers.

All in violation of Title 18, United States Code, Section 1029(a)(1).

**COUNT 5**

**AGGRAVATED IDENTITY THEFT: DECEMBER 12, 2014**

On or about December 12, 2014, in Madison County, Illinois, within the Southern District of Illinois,

**SHU K. CHEN a/k/a Zhang Chang a/k/a Chang Zhang,**  
defendant herein, did knowingly use without lawful authority a means of identification of another person, knowing that the means of identification belonged to another person, during and in relation to the felony offense of Use of a Counterfeit Access Device as charged in Count 4 through the use of an access device account number of a specific individual, victim "D.P.", used without authority in interstate commerce to purchase gift cards.

All in violation of Title 18, United States Code, Section 1028A.

This complaint is based on the following facts:

**AFFIDAVIT**

I, Christopher W. Williams, being duly sworn, hereby depose and state:

1. I am a Special Agent (SA) with the United States Secret Service, assigned to the Resident Agent in Charge in Springfield, Illinois. I have been in Federal Law Enforcement for over 17 years. I have investigated numerous matters including credit card/access device fraud, identity theft and aggravated identity theft. The statements contained in this affidavit are based upon my training and experience as a Special Agent, my personal observations, and my review of all relevant records related to this investigation, as well as information provided to me by other law

enforcement officers involved in this investigation. Because this affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that evidence of violations of:

Count 1: CONSPIRACY TO COMMIT WIRE FRAUD, in violation of Title 18, U.S.C. § 1349;

Count 2: USE OF COUNTERFEIT ACCESS DEVICES: DECEMBER 11, 2014, in violation of Title 18, United States Code, Section 1029(a)(1);

Count 3: AGGRAVATED IDENTITY THEFT: DECEMBER 11, 2014, in violation of Title 18, United States Code, Section 1028A;

Count 4: USE OF COUNTERFEIT ACCESS DEVICES: DECEMBER 12, 2014, in violation of Title 18, United States Code, Section 1029(a)(1);

Count 5: AGGRAVATED IDENTITY THEFT: DECEMBER 12, 2014, in violation of Title 18, United States Code, Section 1028A,

have been committed by **SHU K. CHEN**.

Collinsville Police Department

2. On December 12, 2014, Officer Kevin Tisch, met with victim "M.S." at the Collinsville Police Department. "M.S." advised that her credit card was fraudulently used at the Collinsville Walmart located at 1040 Collinsville Crossing. "M.S." advised that she was alerted by her bank which is Associated Bank that there were two fraudulent charges on her account that were made at the Walmart in Collinsville on 12-11-14.

- One charge was for \$400.00 and the other was for \$389.00.
- She had never lost her card, has not allowed anyone else to use it and could not think of any reason how someone could have been able to obtain her information.
- Her card number was XXXXXXXXXXXXXXX0062.
- She had already canceled the card.

At a later time, suspect Shu K. Chen was identified as the subject in Walmart's video and had been unlawfully using multiple subjects' credit card information.

3. On December 12, 2014, Officer Kevin Tisch, met with victim "M.B." at the Collinsville Police Department in reference to fraudulent charges on his credit card. "M.B." advised that he had multiple fraudulent charges on his credit card that were made in the early morning hours on 12-12-14 at the Walmart in Collinsville and the Radio Shack in Collinsville.

- The charges at Walmart were three separate charges, each for \$400.
- One of the charges was made at 3:35 a.m., the second made at 4:10 a.m., and the third made at 7:38 a.m.
- The charge at Radio Shack was at 7:54 a.m. for \$275.03
- He had never lost his card or loaned it to anyone and he had no idea how someone would have obtained his information.
- He had canceled the account.
- He did not know his account number but his bank was FCB (First Collinsville Bank).

4. On December 12, 2014, Officer Kevin Tisch, met with victim "M.D." at the Collinsville Police Department in reference to fraudulent charges on his credit card. "M.D." advised:

- He was advised by his bank that he had fraudulent charges on his account that were made at the Walmart in Collinsville.
- There were two charges, one for \$124.14 and another for \$10.05.
- He had never lost his card, had it out of his possession, or loaned it to anyone.
- He did not know how someone would have gained access to his account information.
- He did not suspect anyone at this time.

- He had canceled the account at this time.
- His debit card account number was XXXX-XXXX-XXXX-3863.

5. On December 12, 2014, victim "R.Q." went to the Collinsville Police Department and reported that he was checking his debit account and noticed three purchases totaling \$1,400 that were made at Walmart on December 12, 2014 between the hours of 0400 and 0700 hours.

6. In the early morning of December 12, 2014, Officer Tisch responded to the Collinsville Walmart and met with Loss Prevention Officer Tyrone Johnson who advised that they were aware of multiple fraudulent uses of credit cards by a specific subject who was buying multiple gift cards. Officer Tisch was provided with a picture of the subject, a DVD of him at the registers making the fraudulent purchases of gift cards and a printout of each credit card used and the amounts of the purchases. The suspect was observed to be an Asian male, approximately middle aged, wearing a dark, ribbed, puffy coat. Walmart personnel provided a printout of the transactions completed by the suspect by that point in time. The transactions occurred on December 11, 2014 and during the early morning hours of December 12, 2014. The Walmart printout indicated that the following cards, only identified by their last four digits of the account number, were used to buy multiple gift cards:

- Card 3863 for charges of \$124.14 and \$10.05.
- Card 0062 for a charge of \$400.00 and \$389.95.
- Card 8770 for a charge of \$275.86.
- Card 3590 for three charges each of \$400.00.
- Card 8547 for charges of \$400.00, \$500.00 and \$311.64.
- Card 1090 for a charge of \$188.36.

7. At approximately 11:20 a.m. on December 12, 2014, the Walmart Loss Prevention

observed the suspect in this case in the business again. Collinsville Police officers responded to Walmart and met with the suspect, a middle aged, Asian male [who was later identified as **SHU K. CHEN**]. The suspect was recognized to be the same individual from the photo and video that was provided by Walmart earlier in the day. The suspect was observed to be wearing the same dark, ribbed, puffy coat. Walmart Loss Prevention Officer Johnson advised that the suspect was buying more gift cards and believed he had been doing it fraudulently again. The Collinsville police officers placed the suspect in custody to be held for Madison County criminal charges. The officers observed a large amount of credit cards, cash, and gift cards that were in the subject's possession, along with a driver's license from New Jersey that stated his name was Zhang Chang with a date of birth of 06/15/1966.

8. The Collinsville Police Department determined the driver's license in the name of Zhang Chang through New Jersey was a fake. Chang was processed at the Collinsville Police Department. After the processing of Chang was completed and after sending off his fingerprints, the officers received a return that identified him as **SHU K. CHEN** with a date of birth of 12/10/1965. **SHU K. CHEN** spoke little English but advised at that time that he was a citizen of the U.S. and lived in New York, but he was from China.

9. The Collinsville Police Department was subsequently advised by the Saint Peters, Missouri Police Department, the Wood River Police Department, the Granite City Police Department, and the Glen Carbon Police Department that **SHU K. CHEN** had fraudulently used credit cards at businesses in their towns.

10. The following items from **SHU K. CHEN** were placed into evidence:

- Exhibit 1: \$2,482.00 U.S. currency



- Exhibit 2: One cell phone
- Exhibit 3: Fraudulent and Counterfeit Credit cards that were found in his wallet
- Exhibit 4: Gift cards found inside his coat pocket
- Exhibit 5: New Jersey driver's license which turned out to be fake

11. The nine credit cards seized from **SHU K. CHEN** at the time of his arrest displayed the name Chang Zhang. The first 6 numbers (referred to as the bin number) displayed on the front of the cards provides information that identifies the name of the issuing bank. The bin numbers identified the issuers as follows:

- 476300 - Wells Fargo
- 487324 – Norbel Credit Union
- 487333 - Capital One Bank
- 427333 - Barclays Germany (2 cards)
- 427311 - Finansbank (2 cards)
- 484777- Visa Indonesia (2 cards)

12. The Collinsville Police Department contacted Special Agent Kory Kuba with the Internal Revenue Service who also contacted Special Agent Chris Williams with the United States Secret Service. A magnetic card reader was used to swipe each card to determine the card numbers contained in each magnetic strip. It was determined that each card contained different account numbers than that which was displayed on the front of each card. The card information is as follows:

- Card front (4847777222535500)- Magnetic strip (4295310005575500, Scott Credit Union)
- Card front (4273335777300248)- Magnetic strip (4807091012530248, UMB Bank)

- Card front (4273113033464770)- Magnetic strip (4271783843304770, Regions Bank)
- Card front (4873244666434712)- Magnetic strip (4295310008104712, Scott Credit Union)
- Card front (4763002445560643)- Magnetic strip (4060956546970643, Navy Federal CU)
- Card front (4873336991117869)- Magnetic strip (4388576010897869, Chase Bank)
- Card front (4847775332219977)- Magnetic strip (4266841252789977, Chase Bank)
- Card front (4273333666775914)- Magnetic strip (4888937075225914, FIA Card Services)
- Card front (4273112223440411)- Magnetic strip (4453393840000411, Regions Bank)

13. It was then determined that prior to the time of **SHU K. CHEN**'s arrest on December 12, 2014, **SHU K. CHEN** had used the following cards to make fraudulent purchases at the Collinsville Walmart.

*Card front (4847777222535500)- Magnetic strip (4295310005575500, Scott Credit Union)*

- \$500 gift card
- \$700 gift card

*Card front (4273335777300248)- Magnetic strip (4807091012530248, UMB Bank)*

- \$700 gift card
- \$500 gift card

*Card front (4273113033464770)- Magnetic strip (4271783843304770, Regions Bank)*

- \$400 gift card
- \$400 gift card and unknown item (total \$420.71)

14. On December 15, 2014, S/A Kuba and S/A Williams interviewed **SHU K. CHEN** with the assistance of an interpreter. The interview was video and audio recorded. **SHU K. CHEN** was advised orally and in writing [through the assistance of an interpreter] of his Miranda rights and agreed to speak with the agents. **SHU K. CHEN** advised that he was provided the credit cards by another individual who he met at a casino. He advised that he was told to purchase gift cards with the credit cards and then he would receive payment from the other individual. He

acknowledged traveling around the area with this individual and using the credit cards at numerous locations. He identified the other individual as Zhang Chang. He acknowledged that he was aware that the credit cards were fake and fraudulent.

14. A review of the Collinsville Walmart transaction records and video surveillance tapes determined that **SHU K. CHEN** on December 11, 2014, at various times, had used the following counterfeit credit cards to fraudulently purchase gift cards using wire communications in interstate commerce:

- Credit card ending with account number [on the magnetic strip] 8547 belonging to victim "R.Q." [with a different account number on the front] to complete three transactions in amounts of \$400, \$500, and \$311.64.
- Credit card ending with account number [on the magnetic strip] 3590 belonging to victim "M.B." [with a different account number on the front] to complete three transactions in amounts of \$400 and attempt another in an amount of \$500. That account number was also utilized by **SHU K. CHEN** to conduct a transaction at Radio Shack in the amount of \$275.03.
- Credit card ending with account number [on the magnetic strip] 3863 belonging to victim "M.D." [with a different account number on the front] to complete two transactions in amounts of \$124.14 and \$10.05.
- Credit card ending with account number [on the magnetic strip] 0062 belonging to victim "M.S." [with a different account number on the front] to complete two transactions in amounts of \$400 and \$389.

15. A review of the Collinsville Walmart transaction records and video surveillance

tapes determined that **SHU K. CHEN** on December 12, 2014 had used the following counterfeit credit card to fraudulently purchase gift cards using wire communications in interstate commerce:

- Credit card ending with account number [on the magnetic strip] 4770 belonging to victim "D.P." [with a different account number on the front] to complete two transactions, one in the amount of \$400 and a transaction in the amount of \$420.71. [Financial institution information has been requested to determine the identities of other victims for counterfeit credit card transactions also done by **SHU K. CHEN** on December 12, 2014.]

Granite City Police Department

16. On December 13, 2014 victim "P.S." contacted the Granite City Police Department who advised that he was made aware of several fraudulent charges to his Visa credit/debit card issued to him by the Granite City Steel Credit Union. While searching his account ending in 7135 he discovered that card was used at Walmart in Granite City for two separate purchases.

- # 12-12-2014 at 1027 hours for \$400.00
- # 12-12-2014 at 1027 hours for \$419.35

He advised that he still possessed the only card issued to him on that account.

17. Granite City Walmart Loss Prevention Officer Philip Hobbs was able to locate the transaction using the credit card number as a bookmark. Hobbs provided images of a male of Asian race in the checkout aisle. The male can be seen purchasing beef jerky. When the transaction went through the male turned and selected two gift cards placing \$400.00 on each of the cards. Hobbs located the male on several cameras entering the store. The male had arrived at Walmart in a gray or similar color SUV vehicle. The male exited the passenger side of the car that he been parked in the far north corner of the lot. The male walked to the store then hugged the

outside wall so as not to be seen by cameras. He entered the store but crossed over in the foyer and entered through an exit bypassing hidden cameras. The male was wearing what appeared to be dress type shoes, jeans and a light blue shirt. He also wore a dark winter coat with horizontal sections of puffy material. The Granite City Police Department obtained the booking photo of **SHU K. CHEN** from the Collinsville Police Department. In the photo **SHU K. CHEN** is wearing the same color shirt and had been taken into custody with the same winter coat as the male in the Granite City Walmart video.

Wood River Police Department

18. On December 12, 2014, victim "K.F." contacted the Wood River Police Department. He advised that the previous night (12/11/2014) at approximately 11:30 pm, his wife had woke him up and told him that at approximately 7:30 pm his debit/credit card was used at Wood River Walmart for \$800.00. He advised that he told his wife that he had not used his debit/credit card nor did he let anyone else use it. He advised that he still had the card in his possession. Walmart advised that his debit/credit card number was used to purchase (2) two \$400.00 gift cards and the same debit/credit card was denied for \$400.00 for another gift card. The debit/credit card was then identified as a First National Bank of Carlyle Illinois, MasterCard card ending in 3213.

19. Wood River Walmart loss prevention provided surveillance video and transaction history and was able to observe the same subject making more \$400.00 transactions for more gift cards. The following are a list of the transactions:

- Transaction #02578, on 12/11/2014 at 19:22:33 for \$400.00 with last four numbers on the credit card #1912. Signed the name of Chang Zhang.
- Transaction #07555, on 12/11/2014 at 19:24:38 for \$400.00 with last four numbers on the

credit card #3299. Signed the name of Chang Zhang. Should also be noted that on the same transaction two additional credit card numbers were attempted (last four #1912 and #9929) but were denied.

- Transaction #07556, on 12/11/2014 at 19:25:57 for \$400.00 with last four numbers on the credit card #3213 (victim's credit card). Signed the name of Chang Zhang. Should also be noted that on the same transaction two additional credit card numbers were attempted (last four #3299 and #8079) but were denied.
- Transaction #01933, on 12/11/2014 at 19:28:25 for \$400.00 with last four numbers on the credit card #3213 (victim's credit card).
- Transaction #01934, on 12/11/2014 at 19:30:17 for \$400.00 with last four numbers on the credit card #3553. Signed the name of Chang Zhang. Should also be noted that on the same transaction one additional credit card was attempted (last four #3213 victim's credit card) but was denied.

A copy of the video was later logged as evidence. The video and the pictures of the suspect identified him as an older Asian male wearing all dark clothing and a black puffy coat. After viewing still photos from the Collinsville Walmart fraud and the Wood River Walmart fraud, **SHU K. CHEN** was identified as the perpetrator.

20. On December 13, 2014, victim "R.S." contacted the Wood River Police Department and advised that his debit card information was used without his permission at Dollar General located at 1901 Vaughn Dr. He advised that his debit card ending in 7111 was used at Dollar General for \$300.00. He advised that he still has the only copy of his debit card and that he did not give anyone permission to use the card or its information. On December 14, 2014, the Dollar General manager provided a copy of the surveillance video from the transaction. The Wood River Police Department reviewed the video and compared that to photos of **SHU K. CHEN** received from the Collinsville Police Department and was able to identify the perpetrator as **SHU K. CHEN**.

21. The above evidence provides affiant with probable cause to believe that **SHU K.**

**CHEN** has committed the federal felonies set forth in Counts 1 through 5 below:

Count 1: CONSPIRACY TO COMMIT WIRE FRAUD, in violation of Title 18, U.S.C. § 1349;

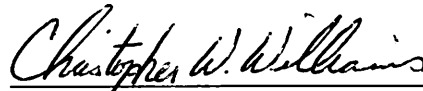
Count 2: USE OF COUNTERFEIT ACCESS DEVICES: DECEMBER 11, 2014, in violation of Title 18, United States Code, Section 1029(a)(1);

Count 3: AGGRAVATED IDENTITY THEFT: DECEMBER 11, 2014, in violation of Title 18, United States Code, Section 1028A;

Count 4: USE OF COUNTERFEIT ACCESS DEVICES: DECEMBER 12, 2014, in violation of Title 18, United States Code, Section 1029(a)(1);

Count 5: AGGRAVATED IDENTITY THEFT: DECEMBER 12, 2014, in violation of Title 18, United States Code, Section 1028A.

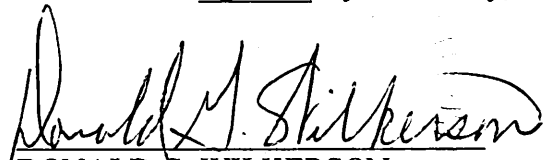
FURTHER AFFIANT SAYETH NAUGHT.



Christopher S. Williams  
Special Agent, United States Secret Service

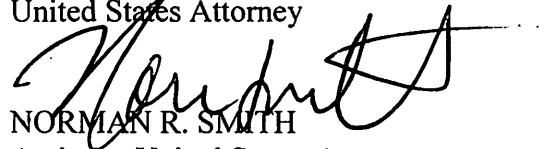
State of Illinois            )  
                                      ) SS.  
County of St. Clair        )

Sworn to before me, and subscribed in my presence on the 8<sup>th</sup> day of January,  
2015, at East St. Louis, Illinois.



DONALD G. WILKERSON  
United States Magistrate Judge

STEPHEN R. WIGGINTON  
United States Attorney



NORMAN R. SMITH  
Assistant United States Attorney